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### R E M A R K S

In the June 2, 2003 applicant presented the reasons for asserting that claim 1 is not obvious over Tounai et al, US Patent 5,870,382, in view of Rogers, US Patent 6,061,735.

Briefly, the Tounai et al reference teaches a module (equipment #1) that contains a control 5, a switch 4, and a bridging unit 3. The bridging unit provides two ports for sending a given signal over two separate and distinct lines to another module (equipment #2). The two lines are termed "W-line" and "P-line," where the W and the P stand for "working" and "protection," respectively. Thus, Tounai et al teach the use of a single module to which both the working and the protection lines are connected.

The Rogers reference is included because it teaches a user-provided directive (a notion that is found in claim 23), but the Rogers directive is a user-defined threshold of a predetermined number of spare segments that trigger a restoration plan.

Claim 23, in contradistinction, is a method claim that controls whether a service line that is connected to a first module is in an active mode, and also controls the second module. There is no method in the Tounai et al reference that addresses the issue of controlling two different modules, to specify that one is a control module and the other is a standby module. Since the Rogers reference does not suggest the use of two modules either, it follows that the combination of Tounai et al and Rogers does not render claim 23 obvious.

Additionally, claim 23 specifies a step of determining, based on the last-specified user directive, whether to accept or reject a stimulus relative to changing mode. As indicated above, the Rogers directive pertains to whether to trigger a regeneration plan. In claim 23, in contradistinction, the user directive assists in determining whether to change the mode of a particular node, or module. This is a distinctly different type of directive. ok

Additionally still, claim 23 specifies setting, or resetting, at least one bit of a first or a second register. No such step is suggested at all in either Tounai et al or in Rogers.

Penultimately, claim 23 specifies a step of comparing two numbers (contained in the first and the second registers, respectively). No such step is suggested at all in either Tounai et al or in Rogers.

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Lastly, claim 23 specifies a step of setting the service line to a standby mode and the protection line to an active mode, when the first number is greater than the second number.

Since the Tounai et al and Rogers combination of references does not have two registers, does not have numbers are installed in those registers through the setting of bits, and does not compares the two numbers, it is not surprising that this combination also does not a step of setting the service line to a standby mode and the protection line to an active mode with the first number is greater than the second number.

In short, none of the claim 23 limitations are disclosed or suggested by the Tounai et al and Rogers combination of references and, therefore, claim 23 is believed to be not obvious in view of these references.

Claim 24 specifies a particular number of bits in the aforementioned registers, and claim 25 defines the specific bits that are set under particular conditions. Clearly, in light of the above comments, claims 24 and 25 are not obvious in view of the Tounai et al and Rogers combination of references.

In light of this supplemental amendment, applicant believes that all of the objections and rejections have been overcome. Reconsideration and allowance are, therefore, respectfully solicited.

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Respectfully,  
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Dated: 2/25/03

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